ETHYL CORPORATION

CORPORATE ENVIRONMENTAL AFFAIRS

August 6, 1986

PLEASE ADDRESS REPLY
TO 451 FLORIDA BLVD
BATON ROUGE, LA 70801

Ms. Virginia Loselle
Michigan Department of Natural Resources
1550 Sheldon Road
Northville, MI 48167

Dear Ms. Loselle:

This letter outlines the further investigations needed to answer those environmental questions still remaining with regard to Ethyl's Ferndale Laboratory property on Eight Mile Road. A soil gas survey will be made in the former gasoline tank farm areas. Questions raised by the high, fluctuating magnetometer readings in the north field and in Area 3, just south of the field, will be resolved by digging in those specific locations.

Mr. Larry Frantz, Technical Director of Analytical Laboratories Division, Burmah Technical Services, has recently provided you with lists of the more critical organic chemicals which his analyses checked but did not detect in the groundwater monitoring well samples last December. Note that Hydro Research Services, who performed those analyses, has since been purchased from Clow Corporation and is now Analytical Laboratories Division. A summary of the chemicals listed by Mr. Frantz is attached. This additional information substantiates that there is no groundwater problem in this area.

Seventy-three underground gasoline storage tanks were removed from the property in February, 1965, at the request of the Ferndale Fire Department. Fire Marshall William LeGault monitored this operation closely, and his report is in your file. He did not observe any spillage or indication of prior leakage. The soil gas survey will provide a second check as to whether or not there is any hidden contamination from this source.

Our consultant plans to use a Century Organic Vapor Analyzer (OVA) instrument calibrated for gasoline components and equipped with a probe approximately three feet long. The OVA has a self-contained vacuum pump to draw the vapor sample through the probe for continuous analysis in the flame ionization detector system. Narrow holes will be hand-augered or punched into the sand and then covered prior to analysis to allow any organic vapor in the interstitial voids to build up in them. The three tank farm areas (between B and C Wings, between the garage gas station and A Wing, and behind R Building) will be surveyed on approximately fifty-foot centers. If a significant organic concentration is found at any of the locations, we will make additional tests to verify and delineate the area affected.

The December magnetometer survey of the open nine-acre plot at the north of the property contained a number of readings which were very high and fluctuated from moment to moment. Our consultants remain adamant that the fluctuations did not indicate buried metal but rather reflected some electrical disturbance, possibly from the 4,800 volt feeder bordering the field. As you pointed out, the most logical way to resolve this is to dig under these spots and see if there is anything there. The seven magnetometer readings over 58,000 gammas on this plot will be investigated.

At each location, we plan to dig down four to five feet with a tractor-mounted auger. If resistance indicates there is any buried concrete, rubble, or metal, we will widen the hole with a back-hoe enough to identify what we have found.

A branch of the electrical feeder parallels the 170-foot traverse run across Area 3, just south of the large field. Most of these readings fluctuated, also, and we will dig under all of them. The bare area near the old incinerator pad will also be checked as you requested.

We plan to begin this investigation on August 26th with the 27th as backup if we are unable to complete in one day. If this date is satisfactory, please advise as soon as possible so that we can schedule our contractors.

Very truly yours,

C. E. Colvin

CEC:imc

Attachment

cc: D. C. Bach
D. E. Park

SUMMARY OF ORGANIC CHEMICALS LISTED
AS "NOT DETECTED" IN DECEMBER, 1985
ANALYSES OF ETHYL CORPORATION'S MONITORING WELLS

Acetonitrile
Acrolein
Acrylamide
Acrylonitrile
Benzene
Benzyl chloride
Bis(2-chloroethoxy) methane
Bis(2-chloroisopropyl) ether
Bromobenzene
Bromodichloromethane
Bromoform
Bromomethane
Carbon disulfide
Carbon tetrachloride
Chloroacetaldehyde
Chloral
Chlorobenzene
Chloroethane
1-Chlorohexane
2-Chloroethyl vinyl ether
Chloromethane
Chloromethyl methyl ether
Chlorotoluene
Dibromochloromethane
Dibromomethane
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Dichlorodifluoromethane
1,1-Dichloroethane
1,2-Dichloroethane
1,1-Dichloroethylene
trans-1,2-Dichloroethylene
Dichloromethane
1,2-Dichloropropane
cis-1,3-Dichloropropene
trans-1,3-Dichloropropene
Diethyl ether
Ethyl benzene
Methyl ethyl ketone
Methyl isobutyl ketone
Paraldehyde
1,1,2,2-Tetrachloroethane
1,1,1,2-Tetrachloroethane
Tetrachloroethylene
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichloroethylene
Trichlorofluoromethane
Trichloropropane
Vinyl chloride
Xylenes

These chemicals, if present, would have been detected.